

PROVENANCE™
Your path to health and well-being

November 4, 1999

Dr. Robert Moore
Office of Special Nutritionals (HFS-450)
Center for Food and Safety and Applied Nutrition
Food and Drug Administration
200 C Street SW
Washington, DC 20204



VIA U.S. POSTAL MAIL

RE: STATEMENTS OF NUTRITIONAL SUPPORT

Dear Dr. Moore:

Pursuant to Section 6 of the Dietary Supplement Health and Education Act of 1994, *Herbalogix, Inc. 987 North Enterprise Street, Orange, CA 92867*, wishes to notify the Food and Drug Administration that it has, within the past 30 days, commenced marketing a line of dietary supplements, which bears statements of nutritional support.

The following list notes the structure function claims for each dietary supplement product. These statements are accompanied by the required disclaimer that is prominently displayed in bold-faced type.

These statements of nutritional support are based on a large body of data, which, in our judgment renders these statements, truthful and non-misleading.

Sincerely,

Joel E. Rath
Managing Director

JR:ln

Enclosures

987 N. Enterprise Street
Orange California 92867-5472
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975 - 0162

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PROVENANCE™

CLAIM	Product Name
Calcium , selenium, and chromium aid in proper heart functioning.*	Objectives Whole Hearted™
Garlic has been extensively researched for its effects on maintaining healthy cholesterol levels.*	Objectives Whole Hearted™
Hawthorne Berry extract, traditionally valued for its use as a heart tonic, helps strengthen the heart.*	Objectives Whole Hearted™
Our Exclusive Cardio Base of herbs and phytonutrients are included to help maintain cardiovascular health and wellness.*	Objectives Whole Hearted™
This potent formula contains Red Wine Grape Extract, a natural antioxidant that has been extensively researched for its effects on the vascular system.*	Objectives Whole Hearted™
Whole Hearted™ for cardiovascular support.*	Objectives Whole Hearted™
Whole Hearted™ is an innovative formulation of nutrients that has been shown to provide cardiovascular support and heart health.*	Objectives Whole Hearted™
Whole Hearted™ Provides cardiovascular support*	Objectives Whole Hearted™
Bilberry fruit extract contains factors which have been shown to promote the body's generation of rhodopsin, a pigment in the retina of the eye that is necessary for vision in dim light.*	Objectives Wink Well™
Contains Lutein which clinical studies have shown to support eye function.*	Objectives Wink Well™
Excellent source of vitamin A, C, E and citrus bioflavonoids — powerful antioxidants that provide protection for the eyes and benefit the vascular-rich eye area.*	Objectives Wink Well™
The Provenance line also includes such cutting-edge products as Wink Well™, a synergistic blend of herbs and nutrients that support eye health and enhanced vision.*	Objectives Wink Well™
Wink Well for eye health*	Objectives Wink Well™
Wink Well™ contains our exclusive Macular Blend of herbs and phytonutrients for extra vision support*	Objectives Wink Well™
Wink Well™ Enhances vision and eye health*	Objectives Wink Well™
Wink Well™ is a synergistic blend of herbs and nutrients that supports eye health and vision.*	Objectives Wink Well™
Wink Well™ Supports Eye Health*	Objectives Wink Well™

PROVENANCE™

CLAIM	Product Name
We help you establish optimum health and well-being through a complete, easy-to-understand program of nutrient-rich products.*	Over view Page
EDS® is a scientifically formulated proprietary blend of high potency plant enzymes that support assimilation and absorption.*	Proprietary Provenance™ Phytonutrient Base
Flax Seed provides a rich source of omega 3 essential fatty acids, which are required by the body for proper functioning of the immune system.*	Proprietary Provenance™ Phytonutrient Base
Full Spectrum Reishi and Shiitake Mushrooms are historically known to promote wellness and help restore the body to a state of balance.*	Proprietary Provenance™ Phytonutrient Base
Proprietary Provenance™ Phytonutrient Base, is a unique concentrate expertly formulated with herbs, super-nutrients, standardized potency herbal extracts, and traditional whole herbs to help boost the body's	Proprietary Provenance™ Phytonutrient Base
ability to optimize nutrition and to balance and restore the system.*	Proprietary Provenance™ Phytonutrient Base
Rose Ox® is a patented antioxidant extract from Rosemary. It is a potent antioxidant that protects cells against free radicals.*	Proprietary Provenance™ Phytonutrient Base
Refreshers Sleep™ Tea	Refreshers Sleep™ Tea
You'll enjoy the honey-sweet citrus flavor of this carefully selected tea blend of 12 traditional herbs to support a relaxing, restful, and natural sleep.*	Refreshers Sleep™ Tea
Clean Slate™ cleansing program is designed to provide gentle cleansing and toning for the entire digestive system.*	Starters Clean Slate™
Provenance Starters Clean Slate™ is a 3-day gentle internal cleansing program that will help prepare your body for maximum absorption of nutrients and establish a solid base for enhanced health and well-being.*	Starters Clean Slate™
Psyllium husk is a superb cleansing fiber and helps promote normal bowel function.*	Starters Clean Slate™
They act as a sponge in the intestinal tract, swelling as they absorb water and waste material in the bowels.* (Psyllium Husk)	Starters Clean Slate™
This gentle 2-part program refines and tones the body, helps eliminate impurities, and prepares the body for better absorption and assimilation of nutrients.*	Starters Clean Slate™
Kaleidoscope™ for Growing Children helps fulfill your child's daily nutritional needs and is designed to help support optimal health and well-being.*	Starters Kaleidoscope™
Rich in vitamin D for bone health*	Starters Life Experience™ for Senior Men/Women
Living Color for Teens™ helps fulfill your teen's daily nutritional needs and is designed to help support optimal health and well-being.*	Starters Living Color for Teens™
Yerba Maté is a popular herb known for its strengthening effects.*	Worldwise Brazilia™
Calcium is essential for maintaining bone density and is an important mineral for all the organs of the body as well as proper nerve, enzyme, muscle and heart functioning.*	Provenance Worldwise™ Herbal Tablets - Entire product
Rosemary is known to have a calming and toning effect on the digestive system.*	Worldwise Mediterranean™